

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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TADEUŚZ KOWALEWSKI, NICHOLAS  
KLIMIUK, OLEG LOGUNOVSKI and  
STANISLAW PUCHALA, individually and on behalf  
of others similarly situated,

Plaintiffs,

v.

RUDOLF SAMANDAROV a/k/a RUDY  
SAMANDAROV, GROUP AMERICAR  
TRANSPORTATION LLC, BC LEASING, CORP.,  
and individual partners of corporate defendants,  
Defendants.

**Civil Action No. 1:07-cv-06706  
(RJS) (GWG)**

**REPLY TO  
COUNTERCLAIMS**

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Plaintiffs TADEUSZ KOWALEWSKI, NICHOLAS KLIMIUK, OLEG  
LOGUNOVSKI and STANISLAW PUCHALA (“Plaintiffs”) as and for their reply to the  
Counterclaims of Defendants RUDOLF SAMANDAROV a/k/a RUDY  
SAMANDAROV, GROUP AMERICAR TRANSPORTATION LLC, BC LEASING,  
CORP., aver as follows:

1. Deny each and every allegation contained in paragraphs 13, 16, 22, 23, 24, 27, 28,  
33, 38, 42, 45, 48, 50, 52.
2. Deny knowledge and information to form a belief as to paragraphs 11, 12, 14, 15,  
17, 18, 19, 20, 21, 25, 26, 29, 30, 31, 32, 34, 35, 36, 37, 39, 40, 41, 43, 44, 47, 49,  
51.

**WHEREFORE,** the replying Plaintiffs TADEUSZ KOWALEWSKI,  
NICHOLAS KLIMIUK, OLEG LOGUNOVSKI and STANISLAW PUCHALA, demand  
judgment dismissing the Defendants RUDOLF SAMANDAROV a/k/a RUDY

SAMANDAROV, GROUP AMERICAR TRANSPORTATION LLC, BC LEASING, CORP.'s Counterclaims, together with costs, disbursements, attorney's fees, and any other and further relief this Court may deem just and proper.

Dated: New York, New York  
October 26, 2007

By: \_\_\_\_\_/s/\_\_\_\_\_  
Marina Trubitsky, Esq. (MT-9371)  
Marina Trubitsky & Associates, PLLC  
*Attorneys for Plaintiffs*  
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